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J. Robert Bray Executive Director

January 11, 2006

Via Facsimile: (202) 690-2221

Mr. Richard Chavez
Manager, Export Programs
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250-0551

Re: Procurement of Commodities for Foreign Donation

7 CFR Part 1496, RIN 0560- AH39

Dear Mr. Chavez:

The Virginia Port Authority is a relative new player in the shipments of food aid cargoes and we have worked hard to position our port as a competitive gateway for such shipments. Our success has come under the existing procedure for the procurement of donation commodities. Naturally, we are concerned about the impact of the proposed new procurement procedure on our continued ability to attract these commodities to our port.

We just became aware of the proposed rule change in late December, as published in the Federal Register/Vol. 70, No. 241 on December 16, 2005. Due to the holiday period, we are just now starting to evaluate the potential impact of the proposed change on our port's competitive position for donation commodities. The Federal Register notice specifically mentions possible changes in port allocation as a potential impact of the proposed rule change. We do not feel that the deadline of January 17, 2006, for the receipt of comments provides us with enough time to thoroughly research and evaluate the impact of the proposed rule change on our port's food aid business. Furthermore, this date does not provide us enough time to adequately prepare thorough and meaningful comments to this proposed rule change for the procurement of donation commodities.

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Accordingly, the Virginia Port Authority is requesting a 45-day extension of the January 17, 2006, date established by the Commodity Credit Corporation for the receipt of comments on this proposed rule change.

Yours truly,

J. Robert Bray

Executive Director